

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS C. GOLDSTEIN,

Defendant.

*
*
*
*
*
*
*
*

CRIMINAL NO. LKG-25-6

**DEFENDANT THOMAS C. GOLDSTEIN’S MOTION TO SEAL FILINGS RELATED
TO HIS APPEAL OF AMENDED ORDER SETTING CONDITIONS OF RELEASE**

Defendant Thomas Goldstein respectfully requests this Court to order that his Appeal of Amended Order Setting Conditions of Release (“Appeal”) and related exhibits be placed under seal. Defendant is simultaneously filing redacted, public versions of those documents. The redacted information consists of sensitive personal information and tracks the redactions the Court has already approved at ECF No. 65 (approving the sealed filing of documents in connection with Defendant’s Emergency Motion to Revoke Order of Detention). Defendant’s proposed redactions also mirror the redactions made by the government at ECF No. 40 and ECF No. 52. The redacted information identifies the names, phone numbers, and other contact information of specific individuals, and identifies certain financial accounts by full account number. The redactions are narrow, and the remaining material is otherwise fully available to the public in the redacted version.

Accordingly, pursuant to Local Rule 207.2, Defendant respectfully requests the Court to approve of the filing of his Appeal and related exhibits under seal.

Respectfully submitted,

/s/ Jonathan I. Kravis

Jonathan I. Kravis (*pro hac vice*)
Stephany Reaves (Bar No. 19658)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue NW, Suite 500E
Washington, DC 20001
(202) 220-1100
Jonathan.Kravis@mto.com
Stephany.Reaves@mto.com

Adeel Mohammadi (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
350 S. Grand Avenue, 50th Floor
Los Angeles, CA 90071
(213) 683-9100
Adeel.Mohammadi@mto.com

Attorneys for Defendant Thomas Goldstein

Dated: February 27, 2025